THE SULTON LAW FIRM

November 4, 2022

William F. Sulton Direct: 414-477-0088 Fax: 414-250-7676 william@sultonlaw.com

Via CM/ECF

Hon. Nancy Joseph United States District Court 517 E. Wisconsin Ave, Rm 320 Milwaukee, WI 53202

RE: The Parties' Discussions Related to Discovery Disputes Case: *Knowlton, et al. v. City of Wauwatosa, et al.*Case No. 2:20-cv-01660-NJ (E.D. Wis.)

Dear Judge Joseph,

I am writing to provide the court with an update on the Parties' discussions about the outstanding discovery disputes.

On November 3, 2022, I spoke with Attorney Kiley Zellner about the discovery in controversy. Plaintiffs will provide supplemental responses to the requests for admissions in controversy by November 5. Also, I explained to Atty. Zellner that I have a trial beginning on Monday but would make every effort to provide supplemental responses to the interrogatories by November 11. Since having that discussion, I have learned that the main lawyer working on the discovery for Plaintiffs will be out of the country next week. As such, November 11 may be too ambitious, but I will still make every effort to accomplish the tasks by that date.

The Parties also discussed outstanding discovery due to Plaintiffs. Specifically, Plaintiffs need answers to interrogatories that were served on June 23, 2021, and September 21, 2021. These answers are particularly important to a deposition that is scheduled for November 14. The court should address those outstanding discovery disputes on Monday.

We thank the court for its time and attention.

2745 N. Dr. M.L.K. Drive, Milwaukee, WI 53212

Hon. Nancy Joseph United States District Court Eastern District of Wisconsin Page 2 of 2

Best Regards,

THE SULTON LAW FIRM

with file

William F. Sulton

cc: Counsel of Record (via CM/ECF)